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Attorneys for Defendants  
 ALBERTSONS COMPANIES, INC, and  
 SAFEWAY INC.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

CALEB HALEY, individually and on behalf  
 of all others similarly situated,

Plaintiff,

v.

ALBERTSONS COMPANIES, INC., a  
 foreign corporation, and SAFEWAY INC., a  
 domestic corporation,

Defendants.

Case No. 1:23-cv-02811-TLT

**JOINT STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND TIME TO RESPOND  
 TO COMPLAINT AND BRIEFING  
 SCHEDULE AS MODIFIED**

Complaint Filed: June 7, 2023

Pursuant to Civil Local Rule 6-1, Defendants Albertsons Companies, Inc., and Safeway Inc.,  
 (“Defendants”) and Plaintiff Caleb Haley (“Plaintiff”) stipulate as follows:

WHEREAS, Plaintiff filed his Complaint on June 7, 2023;

WHEREAS, Defendants were served with the Summons and Complaint on June 12, 2023;

WHEREAS, Defendants currently have until July 5, 2023 to respond to the Complaint;

WHEREAS, Winston & Strawn LLP was recently retained in this matter and will need time  
 to adequately investigate and respond to the claims asserted in this matter;

WHEREAS, Defendants have requested, and Plaintiff has consented to, additional time through and including July 28, 2023, to respond to Plaintiff's Complaint;

WHEREAS, the parties have agreed to the following briefing schedule with respect to Defendants' response to the Complaint:

Date	Pleading
July 28, 2023	Defendants' response to Complaint
August 28, 2023	Plaintiff's Opposition Deadline
September 18, 2023	Defendants' Reply Deadline

WHEREAS, there have been no prior time modifications in this case; and

WHEREAS, extending the foregoing deadlines will not impact any other deadlines in this case.

THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that Defendants shall answer or otherwise respond to Plaintiff's Complaint by July 28, 2023, Plaintiff's deadline to file any opposition brief is August 28, 2023, and Defendants' deadline to file any reply brief is September 18, 2023.

Dated: June 28, 2023

**WINSTON & STRAWN LLP**

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PURSUANT TO STIPULATION, IT IS SO ORDERED. Motion hearing set for 10/17/2023 at 2 PM.

Dated: June 30, 2023

  
The Honorable Trina L. Thompson  
United States Judge